

J.K.J. v. Polk County Sheriff's
Department, Darryl L. Christensen

15-C-428

Transcript of the Video Deposition of:

May 24, 2016



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5/24/2016

Page 17 (56 - 59)

<p style="text-align: right;">Page 56</p> <p>1 A. Yes, sir.</p> <p>2 Q. Now, one of the questions the DCI agents asked you</p> <p>3 is whether you told any fellow prisoners in the</p> <p>4 Polk County jail about the fact that you were</p> <p>5 having sex with Darryl Christensen. Do you</p> <p>6 remember them asking you that question?</p> <p>7 A. Yes, sir.</p> <p>8 Q. And you told them that you had lied to other</p> <p>9 prisoners and denied that you were having sex with</p> <p>10 Darryl Christensen; isn't that true?</p> <p>11 A. Yes, sir.</p> <p>12 Q. Why did you lie to other prisoners and tell them</p> <p>13 that you weren't having sex with Darryl</p> <p>14 Christensen?</p> <p>15 A. I didn't know if I was going to get in trouble</p> <p>16 or -- and also, he told me not to say anything, so</p> <p>17 I didn't want him getting in trouble.</p> <p>18 Q. Darryl Christensen asked you not to tell anybody</p> <p>19 about the fact that you were having sex with him;</p> <p>20 right?</p> <p>21 A. Yes, sir.</p> <p>22 Q. Did he give you a reason why he didn't want you to</p> <p>23 tell anyone?</p> <p>24 A. I know he had said something about his wife.</p> <p>25 Q. And you did what Darryl Christensen asked and</p>	<p style="text-align: right;">Page 58</p> <p>1 Q. What do you recall she told you?</p> <p>2 A. "There's no need to deny it, and he can get in big</p> <p>3 trouble for what he's doing."</p> <p>4 Q. When she said he can get me in trouble, in fact</p> <p>5 she said he can get you into trouble.</p> <p>6 A. No, sir.</p> <p>7 Q. Okay. Explain it to me.</p> <p>8 A. He said that -- she had told me that she knew and</p> <p>9 that there's no reason to deny it because he, she</p> <p>10 had heard him, she had seen it and she seen --</p> <p>11 and he was doing it to other girls, and that he</p> <p>12 could get in big trouble.</p> <p>13 Q. So she told you that Darryl Christensen could get</p> <p>14 in big trouble.</p> <p>15 A. Yes.</p> <p>16 Q. What did she tell you she had seen?</p> <p>17 A. Flirting. And she had, she had heard him over the</p> <p>18 intercom.</p> <p>19 Q. I'm sorry, I don't understand.</p> <p>20 A. The intercom, it's a -- it's a phone that you can</p> <p>21 pick up to call into the bubble.</p> <p>22 Q. No, I understand the intercom, but what?</p> <p>23 A. To hear it beep and have him, he would say stuff</p> <p>24 over, over the intercom. He was -- and she would</p> <p>25 witness me walking out when he would call and he</p>
<p style="text-align: right;">Page 57</p> <p>1 never told anybody about the fact that you were</p> <p>2 having sex with Darryl Christensen; isn't that</p> <p>3 right?</p> <p>4 A. No.</p> <p>5 Q. What about my statement isn't right?</p> <p>6 A. I recall telling another inmate.</p> <p>7 Q. Who was that?</p> <p>8 A. Amanda Benson.</p> <p>9 Q. Was Amanda Benson a fellow inmate during the,</p> <p>10 during every time you were a prisoner in Polk</p> <p>11 County jail?</p> <p>12 A. No.</p> <p>13 Q. Had you known Amanda Benson from outside the jail?</p> <p>14 A. No.</p> <p>15 Q. By the way, had you ever met Darryl Christensen</p> <p>16 before you were incarcerated in July of 2012?</p> <p>17 A. No.</p> <p>18 Q. Why was it that you confided in Amanda Benson?</p> <p>19 A. She knew.</p> <p>20 Q. How did she know?</p> <p>21 A. Because she would witness me walking out of the</p> <p>22 cell when Darryl would call. She would hear him</p> <p>23 at that point over the intercom.</p> <p>24 Q. And did she tell you that she knew?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 59</p> <p>1 knew that -- or she knew that it wasn't my lawyer</p> <p>2 or my agent.</p> <p>3 Q. There were legitimate reasons why you would leave</p> <p>4 the pod; right?</p> <p>5 A. There wasn't legitimate reasons.</p> <p>6 Q. Well, I understand there wasn't when you met</p> <p>7 Darryl Christensen, but on other occasions you</p> <p>8 left the pod to --</p> <p>9 A. Yes.</p> <p>10 Q. -- meet with your lawyer.</p> <p>11 A. Yes.</p> <p>12 Q. And on other occasions you left the pod for</p> <p>13 visiting.</p> <p>14 A. Yes.</p> <p>15 Q. And on other occasions you left the pod to meet</p> <p>16 with healthcare providers; right?</p> <p>17 A. Yes.</p> <p>18 Q. Were there any other legitimate reasons why you</p> <p>19 would leave the pod?</p> <p>20 A. To go to the X room.</p> <p>21 Q. That's the exercise room?</p> <p>22 A. Can be.</p> <p>23 Q. What legitimate reasons would there be to go to</p> <p>24 the X room?</p> <p>25 A. To get away from other inmates, time for yourself.</p>

5/24/2016

Page 18 (60 - 63)

Page 60

1 Q. And the correctional officers in the Polk County
2 jail would sometimes let you do that.
3 A. Yes.
4 Q. Was there any particular criteria? Did you have
5 to ask them?
6 A. Yes.
7 Q. And this wasn't unique to you. Any of the women
8 in the pod could ask for some time alone.
9 A. Yes.
10 Q. And did you observe that the correction officers
11 were generally reasonable about that?
12 A. Yes.
13 Q. And all of these visits to the X room didn't
14 involve sex with Darryl Christensen.
15 A. No.
16 Q. Now, other than Amanda Benson, you never told
17 anybody else in this world you were having sex
18 with Darryl Christensen, right up until when you
19 met with the DCI agents down the hall; isn't that
20 right?
21 A. No.
22 Q. Okay.
23 A. I recall, I'm not really sure on this, but I
24 believe it was right before I met with DOC or DOJ,
25 or it was right after I had told Romando Pagan.

Page 61

1 Q. Yes, I believe you're correct. Could you spell
2 the last name for me?
3 A. P-A-G-A-N.
4 Q. And why did you tell Romando?
5 A. Romando. (Pronouncing.)
6 Q. Okay.
7 A. I was high. Yeah.
8 Q. Okay. That explains it.
9 A. And I didn't tell anybody else. He had brought it
10 up and I felt like I could confide in him.
11 Q. And this was close in time to your interview with
12 the DCI agents.
13 A. Yes.
14 Q. What were you high on, methamphetamines?
15 A. Yes.
16 Q. Where were you when you had this conversation with
17 him?
18 A. New Richmond.
19 Q. Whereabouts?
20 A. Lowrey Hotel.
21 Q. In a hotel room.
22 A. It was -- he was renting, it's Lowrey Hotel used
23 to be a hotel, but now they're apartments, he was
24 renting a room.
25 Q. And were you staying there with him?

Page 62

1 A. No.
2 Q. You were visiting.
3 A. Yes.
4 Q. And you were both taking methamphetamines.
5 A. Yes.
6 Q. And you've now told me all the occasions in which
7 you told anyone in this world you were having sex
8 with Darryl Christensen up until the time that you
9 met with the DCI agents down the hall.
10 A. I, there's another one that was close to it. It
11 was my brother.
12 Q. Okay.
13 A. And I'm not sure if that was before or after also.
14 Q. Which brother was that?
15 A. Justin.
16 Q. And you didn't expect that your brother was going
17 to tell law enforcement, did you?
18 A. No.
19 Q. You told the DCI agents that you visited Darryl
20 Christensen at the firehouse where he worked;
21 right?
22 A. Repeat that.
23 Q. Let me back up. You knew that Darryl Christensen
24 worked at a fire station.
25 A. Yes.

Page 63

1 Q. What did you understand him to be doing there?
2 A. Firefighter.
3 Q. How did you find out that he worked as a
4 firefighter at a fire station?
5 A. He had told me.
6 Q. There came a time when you were released from Polk
7 County jail, and you sent Darryl Christensen a
8 tweet or an email or something like that; right?
9 A. I had called his office after I was released from
10 boot camp.
11 Q. By his office, you mean his office at the fire
12 station?
13 A. Yes.
14 Q. What happened when you called his office?
15 A. I'm not sure if I -- I think a female, I recollect
16 a female answered the phone, and I'm not sure if
17 she had given me her cell phone or left a message.
18 Either way, he got a message from me.
19 Q. Did you have your own cell phone at that point in
20 time?
21 A. Yes.
22 Q. Did -- you don't, by any chance, remember the
23 phone number, do you?
24 A. No.
25 Q. Do you still have the phone?

5/24/2016

Page 19 (64 - 67)

Page 64

1 A. No.

2 Q. What happened to the phone?

3 A. Actually, I might have the phone.

4 Q. Where would it be?

5 A. I had given the phone to my brother to use, and it

6 would be at my mom's house.

7 Q. Which brother?

8 A. Justin.

9 Q. Did there come a time when Justin stopped using

10 the phone?

11 A. Yes.

12 Q. And left it at your mother's house?

13 A. Yes.

14 Q. When was that?

15 A. Around 2013.

16 Q. Did the subscription run out that he couldn't use

17 the phone anymore?

18 A. It was a line off my mom's.

19 Q. Did you send text messages on that phone?

20 A. Yes.

21 Q. Now, Darryl Christensen has testified that he got

22 a text message from you. Do you think that's

23 true?

24 A. He's gotten text messages from me, yes.

25 Q. And you sent him a text message when you got his

Page 65

1 number at the fire station; right?

2 A. Like I said, it was either they gave me his cell

3 phone number or I left a message somehow. What I,

4 what I remember is him calling me back. Somehow

5 he got my number to call me back, and then I

6 texted him after that. But I'm not sure if I

7 texted him a message, if I got the number from the

8 lady or I left a message with the lady. Because I

9 do remember him calling back and him saying

10 something about, "Oh, I thought you were somebody

11 else," because of my J.J.

12 Q. He thought you were somebody else whose initials

13 were J.J.

14 A. Yes.

15 Q. That's what he told you.

16 A. Yes.

17 Q. And there came a time when you went to visit him

18 at the fire station.

19 A. Yes.

20 Q. By yourself.

21 A. Yes.

22 Q. Did you drive yourself there?

23 A. Yes.

24 Q. What time of day was it?

25 A. Afternoon.

Page 66

1 Q. Now, we know this was a time when you weren't in

2 the Polk County jail because you were free; right?

3 A. Yeah.

4 Q. Do you know about when this first time was?

5 A. Between December 14th and Christmas.

6 Q. When you got to the fire station, was there

7 anybody there?

8 A. No.

9 Q. Other than Darryl.

10 A. No.

11 Q. Darryl was there.

12 A. Yes, the first time.

13 Q. Did you tell Darryl why it happened to be that you

14 came to see him at the fire station?

15 A. (No response.)

16 Q. Let me rephrase the question. That was a tough

17 question. Did you tell him you were just there to

18 visit?

19 A. No.

20 Q. Well, there was no fire; right?

21 A. No.

22 Q. So did you give him any reason as to why you just

23 happened to drop by?

24 A. Money.

25 Q. What about money?

Page 67

1 A. I figured I could get some money, and I'll do a

2 massage, so I figured him as a firefighter, I

3 could give massages, get clients.

4 Q. Okay.

5 A. I had my own business doing that, so I was trying

6 to get back my lifestyle and my career, and trying

7 to better myself.

8 Q. Now, you went to see Darryl Christensen at the

9 fire station more than once.

10 A. Yes.

11 Q. How many times, do you think?

12 A. Three.

13 Q. Is it possible it was four?

14 A. No.

15 Q. Now, let me ask you questions about the first time

16 you were there. The first time you visited Darryl

17 Christensen at the fire station, he was there by

18 himself.

19 A. Yes.

20 Q. And did he give you a tour of the station?

21 A. No.

22 Q. What did -- where did you two go within the

23 station the first time you went there?

24 A. The women's bathroom.

25 Q. Both of you?

5/24/2016

Page 20 (68 - 71)

Page 68

1 A. Yes.

2 Q. How did it come to be that both you of you went

3 into the women's bathroom?

4 A. I was just following him.

5 Q. How, what conversation took place between the two

6 of you before you followed him into the women's

7 bathroom?

8 A. I believe I was asking questions about

9 firefighting.

10 Q. And he just walked into the women's bathroom.

11 A. Well, we were, we were making out. He was

12 grabbing, groping, and it was led, how about

13 coming in here, you know, so it was...

14 Q. And he went in first?

15 A. Yes.

16 Q. And you followed.

17 A. Yes.

18 Q. What happened when you went into the women's

19 bathroom?

20 A. Started making out. I was leaned against the sink

21 and had sexual intercourse from behind.

22 Q. This sexual intercourse wasn't unwelcome for you,

23 was it?

24 A. No.

25 Q. Let's go to the next time you went to the fire

Page 69

1 station. What brought you to the fire station the

2 second time?

3 A. Massage.

4 Q. You were there to give him a massage?

5 A. Yes.

6 Q. Did you know that he wanted a massage?

7 A. Yes.

8 Q. How? How did it come to be that you knew he

9 wanted a massage?

10 A. Because he had said it on the phone.

11 Q. And you went there knowing he wanted a massage.

12 A. Yes.

13 Q. What happened when you got there?

14 A. I didn't have my table.

15 Q. Okay. Do you have a table that you can move

16 around in your car?

17 A. Yes.

18 Q. Why didn't you take the table?

19 A. I was on my way to the Super Bowl party.

20 Q. So we can pin that date down.

21 A. Yes.

22 Q. Do you remember who was playing?

23 A. No, sir.

24 Q. Okay.

25 A. Yeah, Patriots, I think, I believe.

Page 70

1 Q. That doesn't tell very much though, does it.

2 A. No. (Laughing.) I don't know, sir.

3 Q. Okay. So you didn't have your table, but you

4 showed up to give him a massage anyway; right?

5 A. Yes.

6 Q. And was he all by himself in the fire station?

7 A. Yes.

8 Q. What happened?

9 A. He gave me a tour.

10 Q. And did you ultimately give him massage?

11 A. No, sir, not that visit.

12 Q. Okay.

13 A. I'm not sure if the third visit was before the

14 Super Bowl or after the Super Bowl.

15 Q. Okay. But in the second visit you didn't have

16 sex.

17 A. Correct.

18 Q. You were --

19 A. Well, I don't know if it was the second or the

20 third. I'm not sure if the second massage or the

21 second visit was before or after.

22 Q. I understand. There was one visit where you were

23 on your way to a Super Bowl party.

24 A. Yes.

25 Q. And you were late.

Page 71

1 A. Yes.

2 Q. So you left the fire station and went to the Super

3 Bowl party.

4 A. Well, sir, I wasn't late. I was just, I don't

5 know the reason why, but I just didn't bring my

6 table, and so that's why I didn't give him a

7 massage.

8 Q. Well, you also wanted to go to the Super Bowl --

9 A. Yes.

10 Q. -- party; right?

11 A. Yes. I just didn't note time-wise.

12 Q. The time got away from you?

13 A. I actually didn't want to give him a massage.

14 Q. Okay.

15 A. So my excuse was I didn't have my table, and I

16 didn't bring my table purposely.

17 Q. Okay.

18 A. Because I wanted to go to the Super Bowl party.

19 Q. More than giving Darryl Christensen a massage?

20 A. Yes.

21 Q. Okay. Now let's talk about the third time. How

22 did it come to be that you went to the fire

23 station the third time?

24 A. Massage.

25 Q. And how was that arranged?

5/24/2016

Page 21 (72 - 75)

Page 72

1 A. I needed -- oh, I thought you were going to ask me
 2 what reason. I -- phone.
 3 Q. Did he call you or did you call him?
 4 A. Sir, there's a time where he had kept on calling
 5 me and calling me and calling me, and called my
 6 mom's house, so I'm not sure if that was the time
 7 or not. But the reason why I called him back is
 8 because I needed money at that time, and so I did
 9 call him back and set up an appointment for a
 10 massage.
 11 Q. And this time did you take the table?
 12 A. No.
 13 Q. Why not?
 14 A. I don't know.
 15 Q. When you got to the fire station on this occasion,
 16 it was just Darryl Christensen there. There
 17 wasn't anybody else in there.
 18 A. Right.
 19 Q. And what did, what did you do?
 20 A. I asked him for money.
 21 Q. Did you give the reason why you wanted money?
 22 A. I didn't come out exactly saying it, but I was
 23 hinting towards what do you think.
 24 Q. What do I think?
 25 A. No, I was hinting towards why do you think I would

Page 73

1 ask for money.
 2 Q. I'm sorry. You lost me.
 3 A. That's why I was hinting. I was hinting towards
 4 him, you know why I'm asking for money.
 5 Q. You didn't want to say you needed money for drugs.
 6 A. It wasn't for drugs. I just I needed money. I
 7 was broke.
 8 Q. But you didn't come right out and say, "Darryl, I
 9 need money."
 10 A. No, I asked him for money.
 11 Q. Okay. Did you give him a reason why you wanted
 12 the money?
 13 A. I said I didn't have any money, I needed money.
 14 Q. Did you say, "Could you give me some money,
 15 because we're just good friends"?
 16 A. No.
 17 Q. What did you say?
 18 A. I said I need money because I had no money.
 19 Q. Okay.
 20 A. I need gas money, I believe it was gas and...
 21 Q. Did you say something like --
 22 A. He said, "Well, how about a massage, that massage,
 23 then?"
 24 I said, "I didn't bring my table."
 25 He said, "Well, we can do it in the

Page 74

1 conference table." There was a conference table
 2 in the fire station that he could lay down on, so
 3 he grabbed a blanket off the chair and put the
 4 blanket on top of the table, and I gave him a
 5 massage. I was going to, and that didn't work, so
 6 I told him to lay on the floor.
 7 Q. Okay. The floor on the conference room?
 8 A. Yes.
 9 Q. On the blanket.
 10 A. Yes.
 11 Q. Had you agreed on a fee for the massage?
 12 A. Yes.
 13 Q. What was that?
 14 A. \$50 for an hour.
 15 Q. Did you give a massage or on the floor on the
 16 blanket?
 17 A. Yes.
 18 Q. How long did that last?
 19 A. An hour.
 20 Q. Is that a standard massage?
 21 A. Yes.
 22 Q. And that led to you having sex with Darryl
 23 Christensen.
 24 A. That didn't lead to. After the massage was done,
 25 it was done. It was done, and then he started --

Page 75

1 he had put his pants back on. Wait, he didn't
 2 have his pants off. He took his pants off and he
 3 sat on the chair.
 4 Q. Okay.
 5 A. Because I only gave him an hour massage on his
 6 back and his neck, because he had hurt his neck.
 7 So I gave him an hour massage on his back and his
 8 neck, and after that he had lifted -- it was done,
 9 the massage was done, and he had lifted the
 10 blanket up and he sat on the chair, and then he
 11 started taking his pants off. And then he had, he
 12 asked me to get on top of him on the top of the
 13 chair.
 14 Q. And you did.
 15 A. No?
 16 Q. Did you have sex?
 17 A. Yes.
 18 Q. How did that come to be?
 19 A. I had told him I didn't want to do it that way or
 20 something. It ended up being on the floor. He
 21 ended up taking the blanket off and putting it on
 22 the floor.
 23 Q. So he wanted to have sex on the chair.
 24 A. Mm-hmm.
 25 Q. And you told him you didn't want to do it that

5/24/2016

Page 23 (80 - 83)

Page 80

1 Q. And if the lights were all off, people in the pod
2 couldn't see what was going on in this hallway.
3 A. Yes.
4 Q. What I said was true.
5 A. Yes.
6 Q. So --
7 A. If they got against the glass.
8 Q. And then they would have to cup their hands around
9 their face?
10 A. Yes. Well, not everyone has -- I mean you can see
11 shadows. You can still see. You can still fill
12 out a form and what they're doing an inch or two
13 away from the glass you can still see. I mean if
14 I was right here and the glass was right where
15 it's at right now, I could still see.
16 Q. No other prisoner ever said they saw you and
17 Darryl Christensen having sex; right?
18 A. Correct.
19 Q. So all in all, you had sex with Darryl Christensen
20 in the Polk County jail three times?
21 A. I had sexual -- I had sexual intercourse with him
22 once and oral sex with him three times. He -- I
23 gave him oral sex twice and he gave me oral sex
24 once.
25 Q. Where were you when he gave you oral sex?

Page 81

1 A. The X room.
2 Q. Inside the X room?
3 A. Yes.
4 Q. Was that the only time when you had sex inside the
5 X room?
6 A. Oral sex, yes.
7 Q. The other two times when you gave him oral sex,
8 you were outside the X room.
9 A. I gave him oral sex in the X room when he gave me
10 oral sex. And the second time I gave him oral sex
11 was in front of the bubble.
12 Q. Okay. Now, every time you had sex with Darryl
13 Christen (sic), did he tell you he would prefer
14 that you not tell anyone?
15 A. Not every time.
16 Q. How many times do you think he told you that he
17 didn't want you to tell anyone?
18 A. I don't know.
19 Q. In any event, you respected his wishes and didn't
20 tell anyone.
21 A. Yes.
22 Q. Besides this recent incarceration where you came
23 here on April 18th, you were in the Polk County
24 jail when the DCI agents came to visit you; right?
25 A. Yes.

Page 82

1 Q. When did you get out of the Polk County jail on
2 that occasion?
3 A. The end of February of 2015.
4 Q. And between the end of February 2015 and your most
5 recent incarceration, the one you're here for now,
6 were you in the Polk County jail on any other
7 occasions?
8 A. Yes.
9 Q. Tell me about that.
10 A. I got out in February, and I ended up coming back
11 in or April.
12 Q. So April of 2015.
13 A. Yeah.
14 Q. What brought you back to the Polk County jail in
15 April of 2015?
16 A. Failed UA.
17 Q. Excuse me?
18 A. Failed UA. I failed a UA, probation violation.
19 Q. And that was a condition of your probation, that
20 you have some drug testing.
21 A. Yes.
22 Q. And you tested positive for methamphetamines?
23 A. Yes.
24 Q. How often did you have to have the test done?
25 A. Whenever they wanted.

Page 83

1 Q. It was random?
2 A. Yes.
3 Q. But you knew you might have to have a -- was it a
4 urine test?
5 A. Yes.
6 Q. You knew that you might have to have a urine test.
7 A. Yes.
8 Q. Why did you take the methamphetamines?
9 A. Addicted.
10 Q. Okay. So you went back to the Polk County jail in
11 April of 2015; right?
12 A. It was somewhere in that area. I'm not sure if
13 was March right away or April. I think it was
14 March.
15 Q. And this was after you talked to the DCI agents?
16 A. Yes.
17 Q. So you're back in the Polk County jail; right?
18 A. Yes.
19 Q. And Darryl Christen (sic) has been charged with a
20 crime; right?
21 A. Yes. I got out of jail right before he was
22 charged, right before he had his first court
23 hearing.
24 Q. And then you had to go back to the Polk County
25 jail because you failed the drug test.

5/24/2016

Page 28 (100 - 103)

Page 100

1 methamphetamines, so he hasn't been talking to me
 2 because of that, because he's been sober for two
 3 years or three years.
 4 Q. Same problem with your --
 5 A. -- older brother.
 6 Q. With your father and your mother?
 7 A. No, they've never done drugs.
 8 Q. I mean the problem that they won't talk to you.
 9 A. Oh yeah. They talk to me, they're supportive, but
 10 they kind of got to the point where what else is
 11 there.
 12 Q. In other words, enough's enough, or something like
 13 that?
 14 A. Yeah, tough love, getting to me.
 15 Q. Do you have any other people in your life that you
 16 talk to?
 17 A. I was talking to Romando for the last two years,
 18 and Thomas, but I don't talk to them anymore.
 19 They -- I -- go ahead.
 20 Q. What was the problem with Romando?
 21 A. Romando was controlling.
 22 Q. He was controlling of you?
 23 A. Yes.
 24 Q. Did he use drugs?
 25 A. Yes.

Page 101

1 Q. What kind of drugs did he use?
 2 A. Methamphetamine.
 3 Q. When is the last time you saw him?
 4 A. I seen him, well, I saw him in the jail here.
 5 That was like last week. He was in the pod.
 6 Q. What was your understanding of why he was here?
 7 A. He got another charge, another possession.
 8 Q. What about Thomas, when's the last time you saw
 9 him?
 10 A. I saw him here too, Polk County jail.
 11 Q. When was that?
 12 A. April 20th, 21st or somewhere in there. That week
 13 after I got arrested I seen him in the men's cell.
 14 Q. Have you talked to either of them?
 15 A. No.
 16 Q. You talked about your mental health. Is there
 17 anything about your physical health, do you have
 18 any problems?
 19 A. No.
 20 Q. That's all I have.
 21 MR. BOHL: Mr. Trost, do you have any
 22 questions?
 23 FURTHER EXAMINATION
 24 BY MR. TROST:
 25 Q. Good afternoon. I just have maybe one or two

Page 102

1 questions. Good afternoon, Miss **JKJ** My name
 2 is Kevin Trost. I represent an insurance company,
 3 Wisconsin County Mutual Insurance, in this case.
 4 In your interactions with Mr. Christensen in
 5 the jail setting, did he ever say to you or
 6 mention to you that he could possibly lose his job
 7 as a result of having sexual relations with you?
 8 A. Yes. It was either that or it was -- sir, it was
 9 either --
 10 Q. A thing he mentioned once or something he
 11 mentioned on multiple occasions?
 12 A. Once. I recollect him saying that once, but for
 13 some reason, I'm not positive on this, because I'm
 14 not sure if it was here at Polk County or at the
 15 fire hall. And I know that he said something
 16 about his wife, losing his wife, having problems
 17 with his wife.
 18 Q. Okay. But you recall him mentioning something
 19 about possibly losing his job?
 20 A. It was something about a job. I'm not, I'm not
 21 correct on the exact words.
 22 Q. Okay. And in the context of that conversation,
 23 did you believe he was talking about his job at
 24 the jail or job as a firefighter?
 25 A. The jail. The jail.

Page 103

1 Q. Okay. Do you remember about when that
 2 conversation occurred?
 3 A. No.
 4 Q. Was it after, after one of your sexual encounters
 5 with him?
 6 A. Yes.
 7 Q. I don't have any further questions, Ms. **JKJ**
 8 Thank you for meeting with us today.
 9 A. Thank you.
 10 RE-EXAMINATION
 11 BY MR. BOHL:
 12 Q. Ms. **JKJ**, I just have a couple of quick
 13 questions. In the DCI report there was reference
 14 to a picture of Darryl Christensen that had been
 15 in a local newspaper. Do you recall seeing such a
 16 picture?
 17 A. Yes.
 18 Q. Did you have that picture taped up above your bed
 19 in your cell?
 20 A. No.
 21 Q. Who did?
 22 A. This lady, they called her Poo. She was friends
 23 of Darryl's family.
 24 Q. That's P-O-O, Poo?
 25 A. Yeah, that was her nickname. I don't remember --